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May 5, 2022

BY ECF

Hon Andrew L. Carter Jr.
United States District Court Judge
United States District Court SDNY
500 Pearl Street
New York, NY 10007

RE: United States v. Perry Joyner et al., 21 Cr. 673 (ALC)

Dear Judge Carter:

I represent defendant Perry Joyner in the above-captioned matter pursuant to the Criminal Justice Act. I write on behalf of Mr. Joyner and his co-defendant Mario Feliciano, represented by Esere Onaodowan. Pursuant to Your Honor's Order at the Initial Conference held on May 3, 2022, we respectfully submit this letter regarding the Government's proposed Protective Order so Ordered by this Court on December 28, 2021. (Dkt. 66) ("Protective Order")

The Government's proposed Protective Order allows for the Government to designate certain materials in this case as "Attorneys' Eyes Only" ("AEO"). (Dkt. 66 pp. 2-3) At yesterday's conference, the Government represented to the Court that although documents so designated could not be shown to our clients, counsel may share the information contained therein with our clients with the limitation that counsel was not permitted to share the names of the individuals identified in such documents with the defendants.

We have since conferred with the Government, which confirmed that counsel may share the information contained in AEO documents, other than the identity of witnesses, with the defendants. The Government further stated that it would redact and replace with pseudonyms the names and identifying information of witnesses in AEO documents and provide a key for tracking witnesses consistently throughout the Government's productions. The Government has also requested, and defense counsel and defendants have agreed, that the defendants may not take notes or otherwise maintain in their possession any record of any of the information communicated to them from any documents marked as AEO.

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Based on that reading of the AEO Designation and the parties' agreement, Mr. Joyner and Mr. Feliciano do not object to the entry of the Protective Order.

Respectfully,

Susan J. Walsh

/s/

CC: Counsel for All Parties (via ECF)